

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2021 MAR 26 A 10:14

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA
ex rel. HADRON INDUSTRIES, INC.,

Plaintiff/Relator,

v.

TRIANGLE EXPERIENCE GROUP,
INC., *et al.*

Defendants.

CASE NO.: 1:18-cv-1487 (LMB/IDD)
Filed *Ex Parte* and Under Seal
Pursuant to 31 U.S.C. § 3730(b)

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a), the United States, having intervened for purposes of settlement in this *qui tam* brought pursuant to the False Claims Act ("FCA"), 31 U.S.C. §§ 3729-3733, and Relator Hadron Industries, Inc. ("Relator"), hereby notify the Court of the voluntary dismissal of this action as set forth below:

1. Relator dismisses with prejudice all claims alleged in his Complaint as to itself and against Triangle Experience Group, Inc., Alqimi Analytics & Intelligence, LLC, Robert Clare, and Sean McCluskey ("Defendants").
2. The United States dismisses with prejudice all claims for the "Covered Conduct," as that term is defined in the Settlement Agreement, and dismisses without prejudice claims for all other conduct alleged in the Complaint.
3. Except as provided in the Settlement Agreement, the parties shall bear their respective costs, including any possible attorneys' fees or other expenses of litigation.
4. No Defendants have filed an answer or responsive pleading to the Complaint.

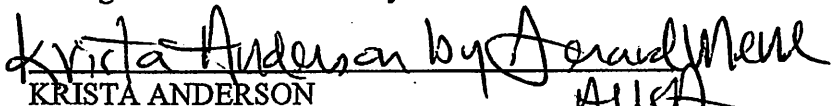
5. Pursuant to the Settlement and *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994), the Court shall retain jurisdiction to enforce the terms of the Settlement Agreement.

Dated: 3/26/2021

By:

BRJAN M. BOYNTON
Acting Assistant Attorney General

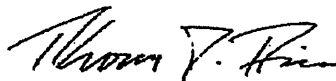
RAJ PAREKH
Acting United States Attorney


KRISTA ANDERSON

Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3995
Fax: (703) 299-3983
E-mail: krista.anderson@usdoj.gov

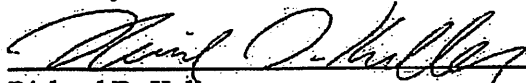
JAMIE ANN YAVELBERG
MICHAL TINGLE
BENJAMIN WEI
Attorneys
United States Department of Justice
Civil Division - Commercial Litigation Branch
175 N. Street, NE
Washington, D.C. 20002
Tel: 202- 616-2875
Email: benjamin.c.wei@usdoj.gov

Counsel for the United States



THOMAS J. FINN
PAULA CRUZ CEDILLO
McCarter & English, LLP
185 Asylum Street
Hartford, CT 06103
Tel: (860) 275-6783
E-mail: tfinn@mccarter.com
E-mail: pcedillo@mccarter.com

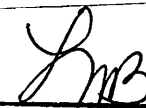
Counsel for Relator



Richard D. Kelley
Raighne C. Delaney
Bean Kinney & Korman PC
2311 Wilson Blvd., Suite 500
Arlington, VA 22201
E-mail: rkelley@beankinney.com
E-mail: rdelaney@beankinney.com

*Counsel for Triangle Experience Group, Inc.,
Robert Clare, and Sean McChuskey*

IT IS HEREBY SO ORDERED this th26 day of March, 2021.

/s/ 

Leonie M. Brinkema
United States District Judge